

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES & EXCHANGE COMMISSION,

Plaintiff,

v.

RIPPLE LABS INC.,
BRADLEY GARLINGHOUSE,
and CHRISTIAN A. LARSEN,

Defendants.

No. 20-cv-10832 (AT)

NOTICE OF MOTION TO OBTAIN INTERNATIONAL DISCOVERY

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and all prior proceedings in this case, Defendants Bradley Garlinghouse and Christian A. Larsen will move this Court to issue under its seal and signature the attached Letters of Request (Exhibits 2 through 17 to the enclosed Memorandum of Law) on behalf of Mr. Garlinghouse and Mr. Larsen to obtain documents from the following foreign third parties:

iFinex Inc. d/b/a Bitfinex
Suite 13/F, 1308 Bank of America Tower
12 Harcourt Road, Central
Hong Kong, China

Noah Trade Ltd. d/b/a Bitforex
Room 1502-U4 Easey Commercial Building
253-261 Hennessy Road
Wan Chai
Hong Kong, China

BGH One Ltd. d/b/a Bithumb
15~16F, 124, Teheran-ro, Gangnam-gu
Seoul
Republic of Korea

Bitlish Ltd.
14056, 43 Bedford Street
London WC2E 9HA
United Kingdom

GBM Foundation Company, Ltd. d/b/a BitMart
c/o Stuarts Corporate Services Ltd
4th Flr Cayman Financial Center 36A Dr Roy's Drive
George Town, Grand Cayman, KY1-1104
Cayman Islands

BMXDM Technology PTE. Ltd. d/b/a AscendEX (formerly Bitmax)
10 Marina Boulevard #39
Marina Bay Financial Centre
Singapore, 018983

Bitrue Singapore PTE. Ltd.
73 Upper Paya Lebar Road, #06-01C
Centro Bianco
Singapore, 534818

Bitstamp Ltd.
5 New Street Square
London EC4A 3TW
United Kingdom

Coinbene Limited Vanuatu
The Adelphi
1 Coleman Street,
Singapore, 179803

Coinone Co., Ltd.
4th floor, 69 Hangang-daero,
Yongsan-gu,
Seoul
South Korea

Hit Tech Solutions Development Ltd. d/b/a HitBTC
Suite 15, Oliaji Trade Centre, Francis Rachel Street
Victoria
Mahé
Seychelles

Huobi Global Limited
Room 1404-05, Nan Fung Tower
88 Connaught Road Central
Hong Kong, China

Korbit, Inc.
5F 376 Gangnam-daero Gangnam-gu
Seoul, 06232
South Korea

Aux Cayes FinTech Co. Ltd. d/b/a OKEx
30, Kenilworth, Flat 4
Sir Augustus Bartolo Street
Ta'xbiex
Malta

Upbit Singapore Pte. Ltd.
1 Harbourfront Avenue #16-02
Keppel Bay Tower
Singapore, S098632

ZB Network Technology PTE. Ltd.
1 North Bridge Road, #06-18
High Street Centre
Singapore, 179094

For the reasons set forth in the attached supporting Memorandum of Law, Mr. Garlinghouse and Mr. Larsen respectfully request that the Court issue the attached Letters of Request for International Assistance pursuant to 28 U.S.C. § 1781(b)(2) compelling the above-listed entities to produce documents so that the Mr. Garlinghouse and Mr. Larsen can receive evidence before the close of fact discovery.

We understand that the Plaintiff the Securities and Exchange Commission does not object to this motion.

Dated: June 2, 2021

Respectfully submitted,

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